

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)

Tribal Mobility Fund Phase I Auction 902))

AU Docket 13-53

To: The Commission

COMMENTS OF COPPER VALLEY WIRELESS, LLC

Copper Valley Wireless, LLC (Copper Valley) is a wireless provider serving South central Alaska. Copper Valley hereby submits comments on the potential eligibility of certain census blocks for Phase I Tribal Mobility Fund support. Specifically, Copper Valley will demonstrate that a number of the census blocks identified by the Federal Communications Commission (FCC or Commission) in its Public Notice released March 29, 2013 used Mosaik Solutions (formerly American Roamer) Roamer Data to establish unserved census blocks which are to be used by service providers to obtain funding from the Universal Service Reform Tribal Mobility Fund Phase I using Reverse Auction to provide 3G or better mobile voice and broadband services to unserved on Tribal lands. The data provided by Mosaik Solutions (Mosaik) has inaccurately listed census blocks as eligible unserved for Copper Valley census blocks. Today, Copper Valley does in fact provide 3G service in the census blocks listed in Attachment A. Attachment B – E depicts Copper Valley's 3G coverage propagation map which has been overlaid on the unserved census blocks in the Valdez-Cordova Census Area which 3G service is currently provided. For all of these reasons the 6 census blocks originally deemed "unserved" by the Commission should instead be

redesignated as "served" and accordingly must be removed from inclusion in Auction
902.

Respectfully submitted,

COPPER VALLEY WIRELESS, LLC

By: */s/ David Dengel*

David Dengel
Chief Executive Officer for
Copper Valley Wireless, LLC
P.O. Box 337
Valdez, Alaska 996868
907-835-2231

May 10, 2013

DECLARATION OF COPPPER VALLEY WIRELESS, LLC

I, David Dengel, do hereby declare under penalty of perjury under the laws of the United States of America, the following:

1. I am the Chief Executive Officer for Copper Valley Wireless, LLC.
2. I have read the foregoing Comments. I have personal knowledge of the facts and representations set forth herein, and believe them to be true and accurate.



David Dengel



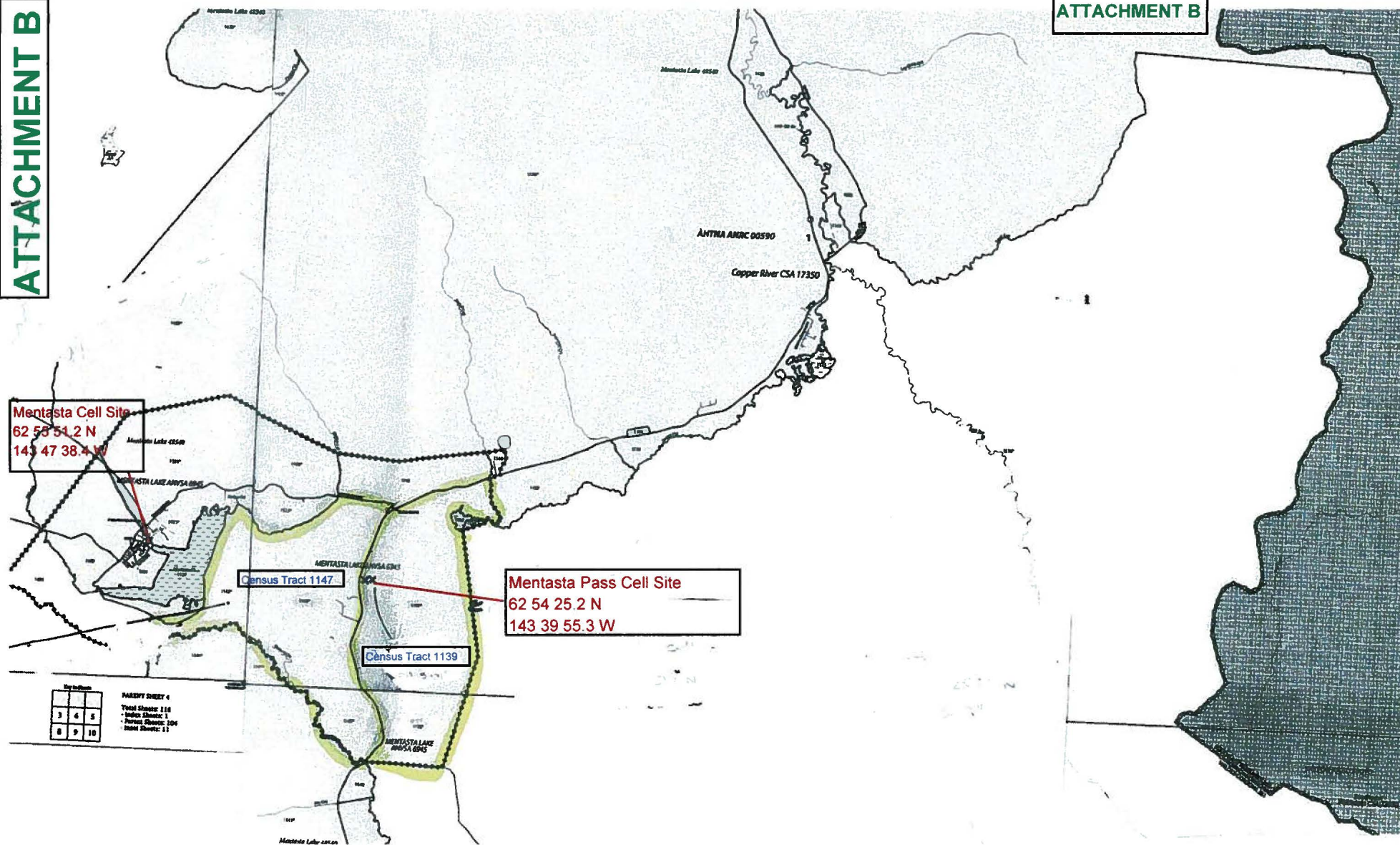
Date

Attachment A: List of Served Census Blocks to be Removed from Auction 902

Name	Census Block	State	County	Tract	Tribe
Mentasta Lake	22610001001139	AK	Valdez-Cordova Census Area	2261000100	Mentasta Lake ANVSA
Mentasta Lake	22610001001142	AK	Valdez-Cordova Census Area	2261000100	Mentasta Lake ANVSA
Copper Center	22610001003050	AK	Valdez-Cordova Census Area	2261000100	Copper Center ANVSA
Copper Center	22610001003051	AK	Valdez-Cordova Census Area	2261000100	Copper Center ANVSA
Chitina	22610001004129	AK	Valdez-Cordova Census Area	2261000100	Chitina ANVSA
Tatitlek	22610003001226	AK	Valdez-Cordova Census Area	2261000300	Tatitlek ANVSA

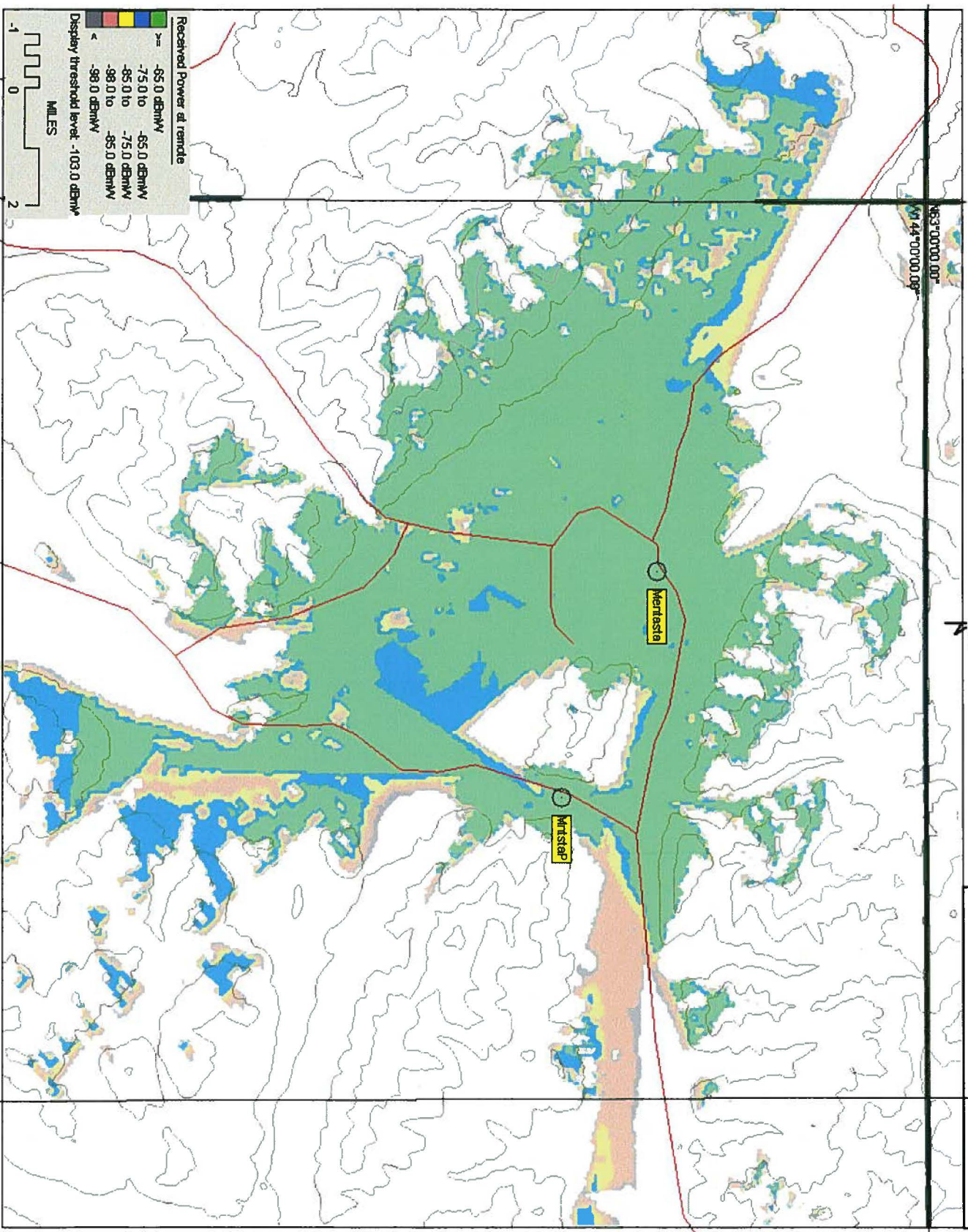
ATTACHMENT B

ATTACHMENT B



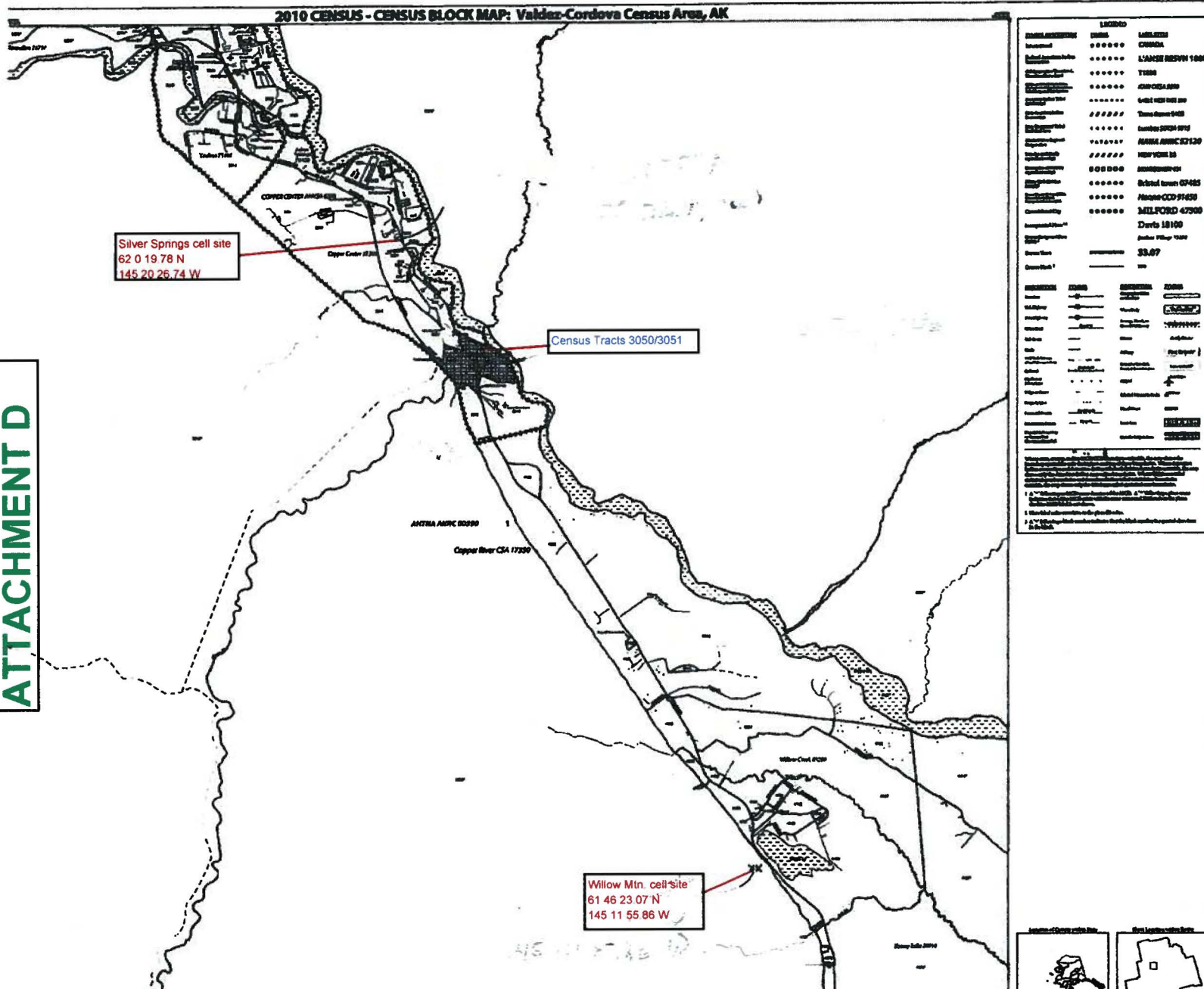
Copper Valley Wireless Coverage Plot

ATTACHMENT C



Mentasta and Mentasta Pass, Alaska

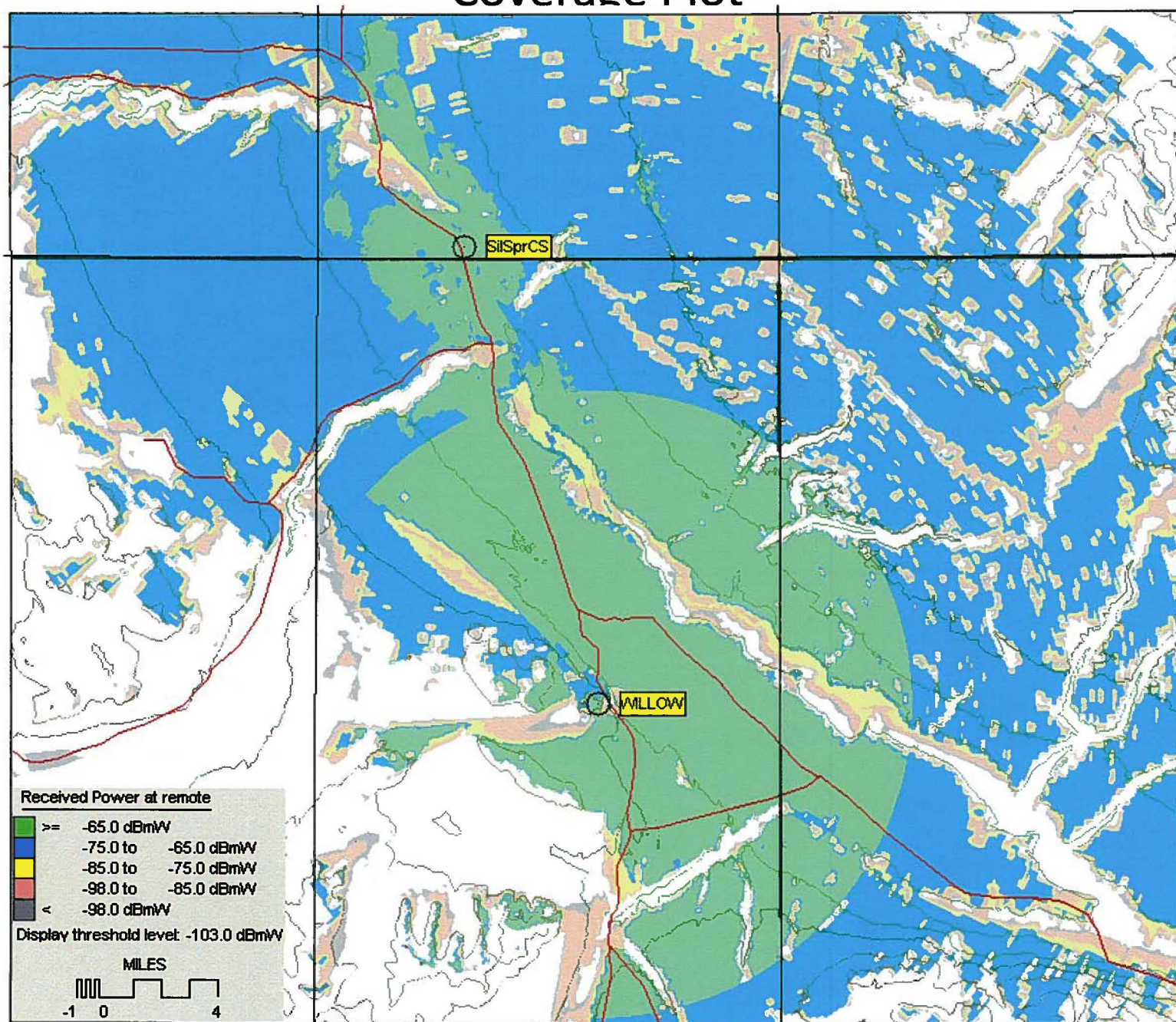
ATTACHMENT D



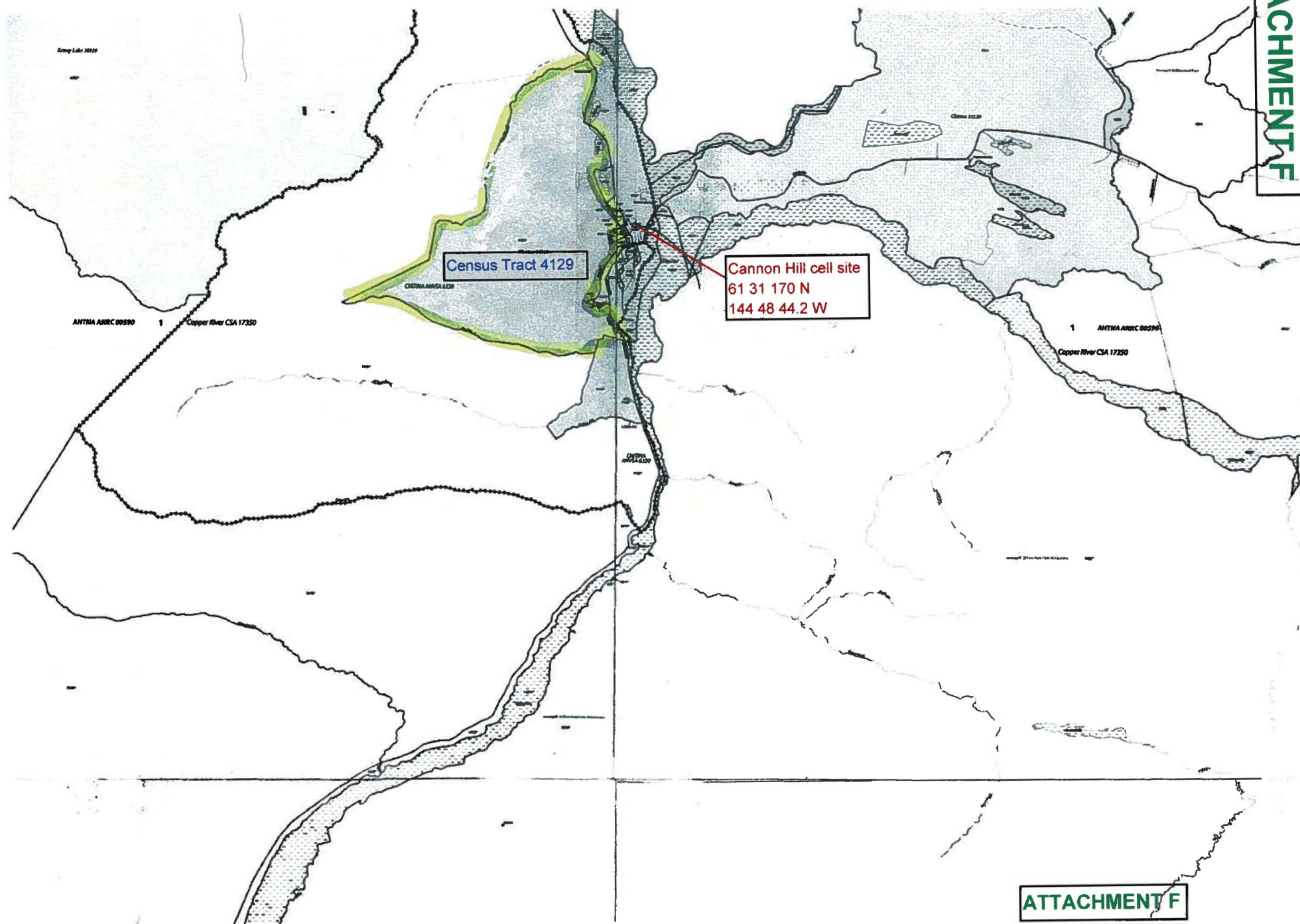
[illegible][illegible]

Copper Valley Wireless Coverage Plot

ATTACHMENT E

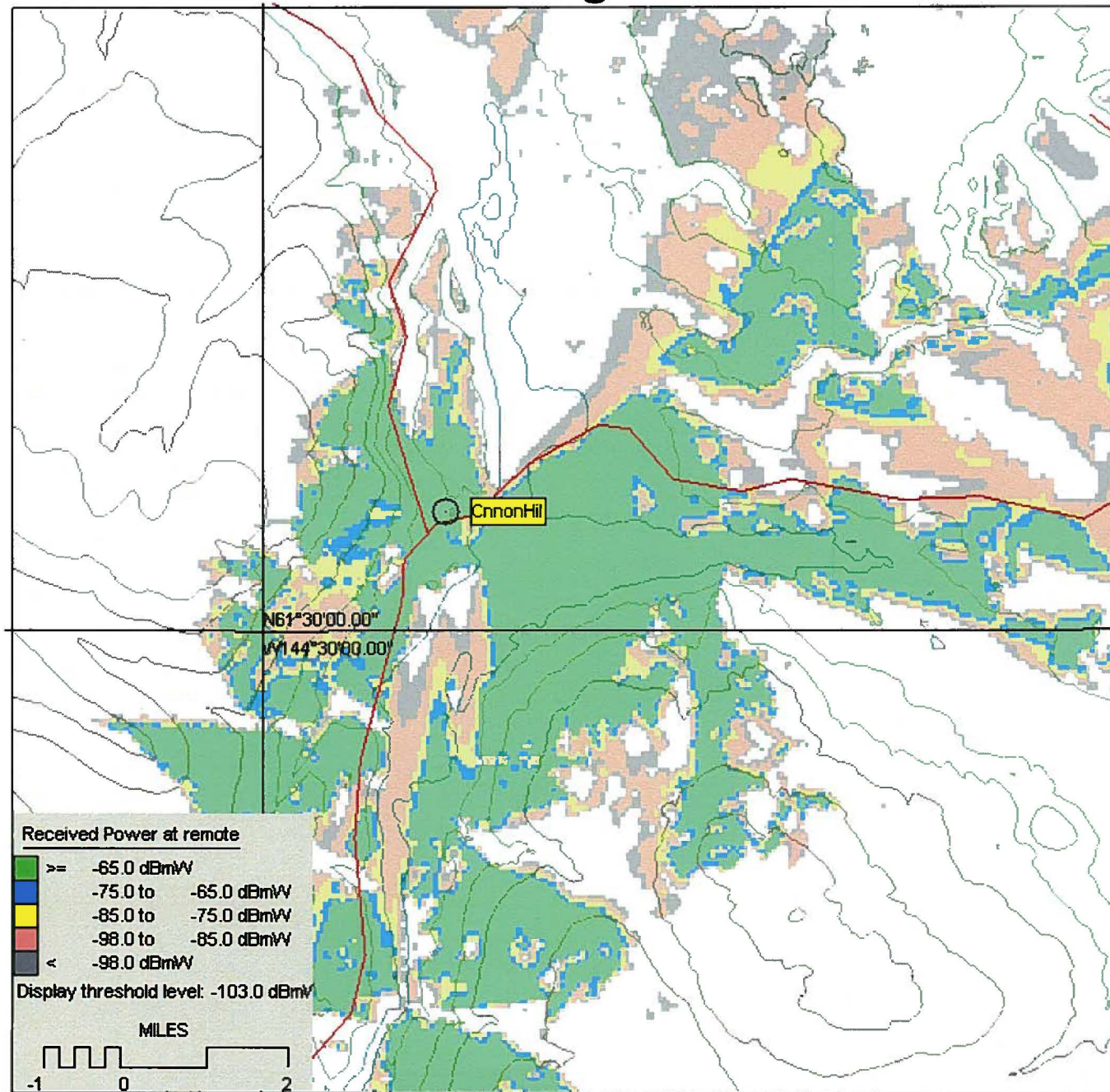


Willow Mountain and Silver Spring, Alaska



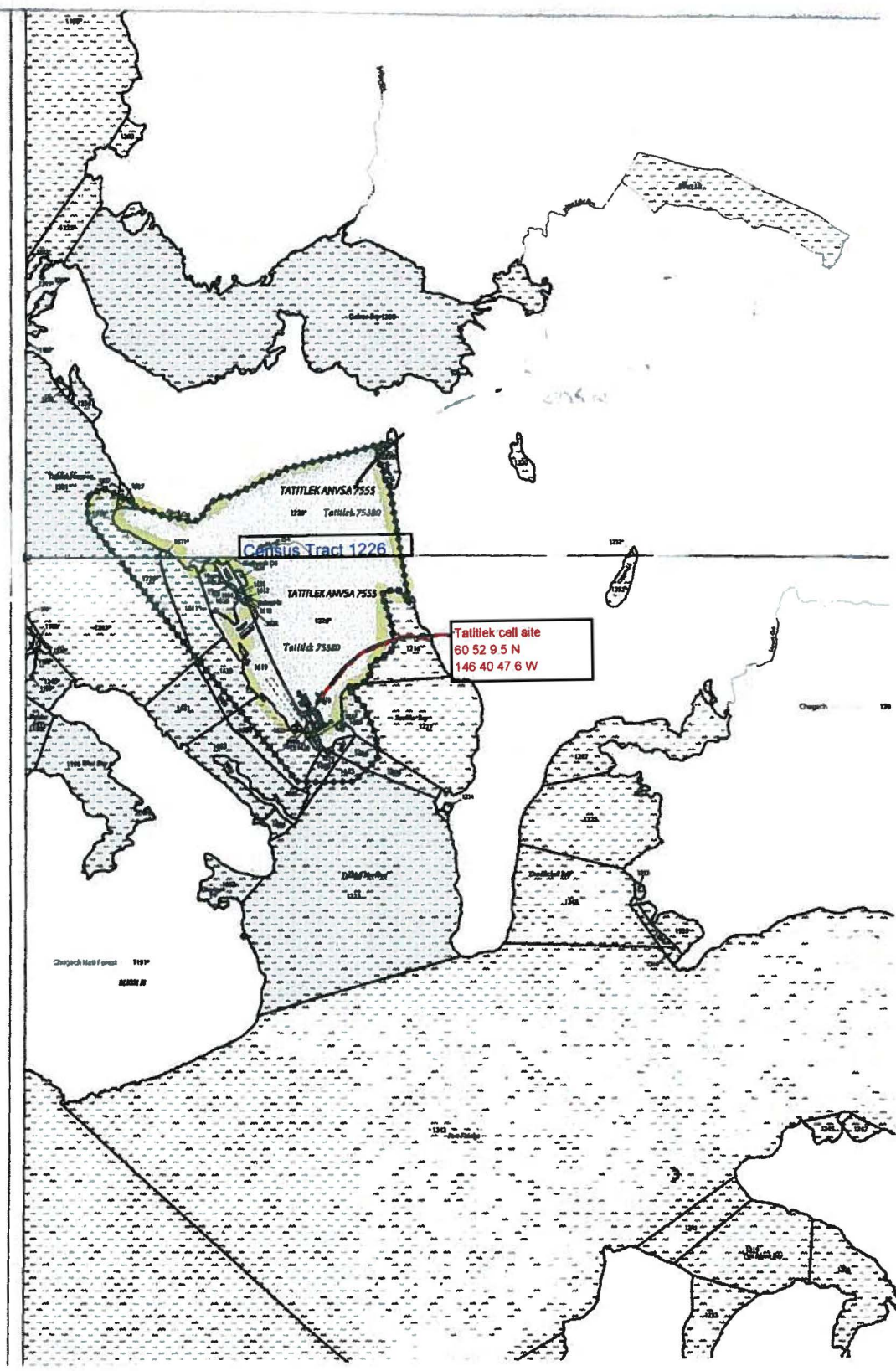
Copper Valley Wireless Coverage Plot

ATTACHMENT G



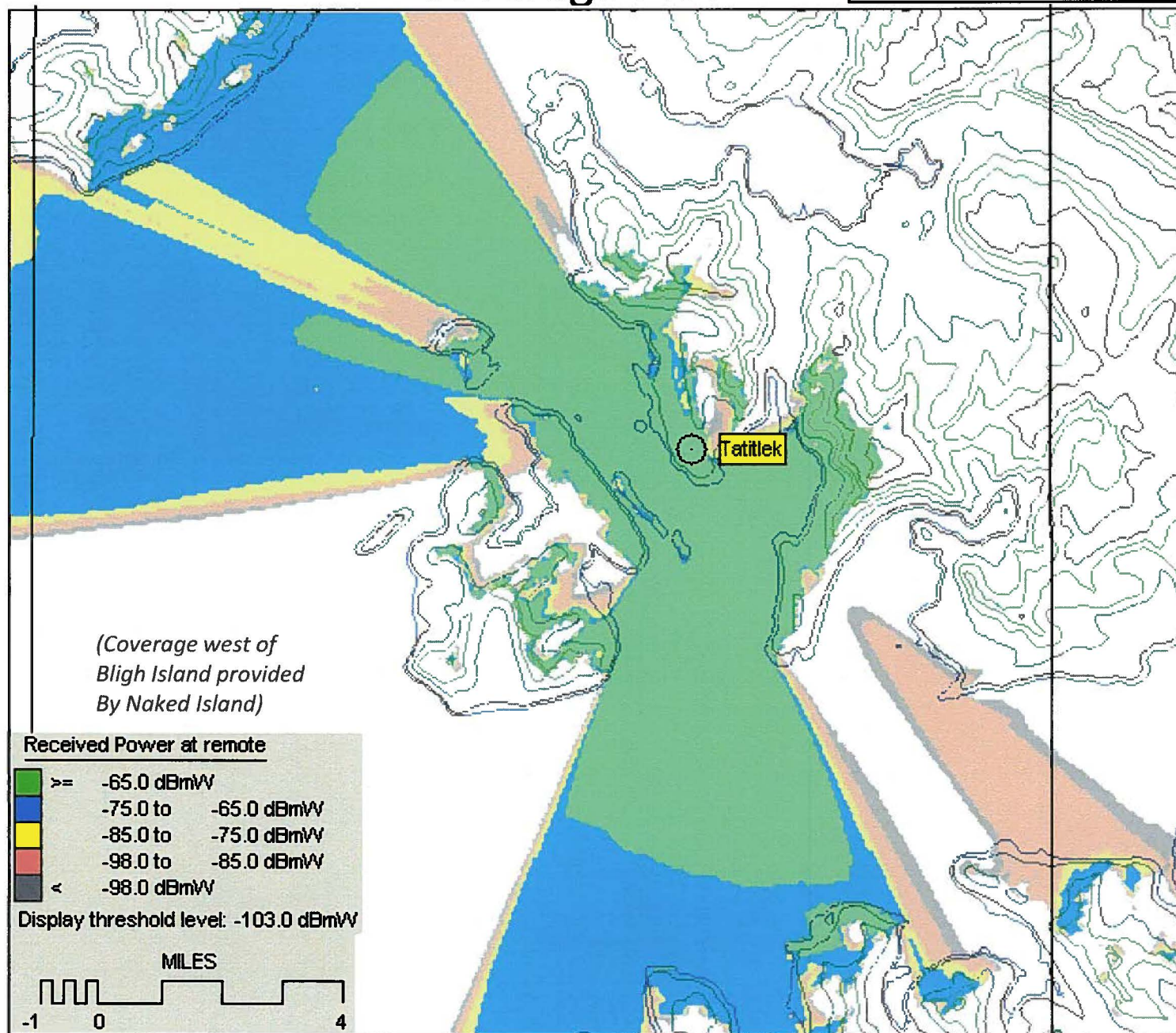
Cannon Hill, Chitina, Alaska

ATTACHMENT H



Copper Valley Wireless Coverage Plot

ATTACHMENT I



Village of Tatitlek, Alaska